

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re: Lance Patrick Alexander and
Terri Ann Alexander,
Debtors,

Lance Patrick Alexander and
Terri Lynn Alexander,
Movants,

v.

Ronda J. Winnecur, Chapter 13 Trustee,
Respondents,

Bankruptcy No. 17-21820-JAD

Chapter 13

Related to DD No. 138, 145
DD No. 148

STIPULATION CONCERNING DEBTORS' AMENDED CLAIM OF EXEMPTIONS

AND NOW the Debtors Lance and Terri Alexander as well as the Standing Chapter 13 Trustee Ronda J. Winnecur, through their respective counsel, file the within stipulation concerning the Debtors' amended claim of exemptions filed at DD No. 138, and the Trustee's Objection to said Exemptions at DD No. 145. Pursuant to said Stipulation, the parties aver the following:

WHEREAS, the Debtors filed an amended claim of exemptions for the debtor Wife Terri Lynn Alexander at DD No. 138, containing additional exemptions claimed related to a defective medical device claim at line 34.2;

WHEREAS, the Debtor Wife's exemptions related to Line 34.2 are listed at 100% Fair Market value, instead of providing a fixed value;

WHEREAS, after discussion between counsel for the Debtors and counsel for the chapter 13 Trustee, the parties agree these exemptions should have a fixed value listed;

THEREFORE, the Debtors and the Chapter 13 Trustee stipulate as follows:

1. The exemption claim related to schedule B, Line 34.2, based on 11 USC §522(d)(5) is amended to provide for an exemption claim of \$13,100 from the Debtor Wife's available exemptions.
2. The exemption claim related to Schedule B, Line 34.2, based on 11 USC §522(d)(11)(D), is amended to provide for an exemption claim of \$23,675 from the Debtor Wife's available exemptions.
3. The Office of the Chapter 13 Trustee shall have 30 days from the date of this stipulation to object to either of the above-listed exemptions.

WHEREFORE, the Debtor and the Chapter 13 Trustee so stipulate, and present said stipulation to this Court.

Date: July 28, 2021

Respectfully Submitted,

/s/David A. Colecchia
David A. Colecchia, Esq.
David A. Colecchia and Associates
324 South Maple Ave.
Greensburg, PA 15601
724-837-2320
PA.I.D.No. 71830
colecchia542@comcast.net

RONDA WINNECOUR, CHAPTER 13 TRUSTEE

By: /s/Owen W. Katz
Owen W. Katz, PA I.D. 36473
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
Email: okatz@chapter13trusteewdpa.com